

**IN THE UNITED STATES DISTRICT COURT  
FOR THE NORTHERN DISTRICT OF OKLAHOMA**

**BRYAN SAMS,**  
**Plaintiff,**

**VS.**

**Case No. 4:24-cv-00602- CVE-SH**

**JOHNSON MATTHEY, INC., d/b/a  
TRACERCO, a foreign corporation,  
THE UNIVERSITY OF TULSA, a not-for-  
profit, Oklahoma Corporation,  
CHEVRON USA, INC., a foreign corporation  
CHASE ENVIRONMENTAL GROUP, INC.  
a foreign corporation,  
CHINA INSTITUTE OF ATOMIC ENERGY,  
a foreign corporation,  
Defendants.**

**SECOND UNOPPOSED MOTION TO EXTEND TIME TO ANSWER THE MOTION  
TO DISMISS OF DEFENDANTS JOHNSON MATTHEY, INC., CHEVRON USA, INC.,  
CHASE ENVIRONMENTAL GROUP, INC., [Doc. 25] AND THE UNIVERSITY OF  
TULSA [Doc. 26]**

**COME NOW**, Plaintiff, Bryan Sams, by and through his attorneys of record, G. Gene Thompson, Esq., and Charles C. McCaskey, Esq., of CREEK COUNTY LAW, PLLC, and moves this Court to enter a *Second Order Extending Time to Responded to Defendants' Johnson Matthey, INC., Chevron USA, INC., Chase Environmental Group, INC., [Doc. 25] and the University of Tulsa [Doc. 26]* by fourteen days. To-wit, he states and alleges the following.

1. All Defendants filed their *Motion to Dismiss* (“*Motion*”) on February 24, 2024.
2. That Plaintiff’s Counsel reached out to Defendants’ Counsel through Michael S. Linscott.
3. Mr. Linscott said that he would communicate with all Defendants, and it was conveyed that all Defendants agreed to an extension.
4. The Defendants agreed to extend the time to answer to fourteen days after the April 16, 2025, in which the parties will attempt early mediation.

5. The Parties agree on a new date of April 30, 2025, for the response.
6. A extending the time to answer will not delay the trial date further.
7. The above constitutes good cause to allow additional time to answer.

**WHEREFORE**, premise considered, Plaintiff prays this Court extend the time to answer Defendants' *Motion* until April 30, 2025, and any other relief that the Court finds are proper and just.

Respectfully submitted,

s/ Charles C. McCaskey

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**ATTORNEYS FOR PLAINTIFF**

**CERTIFICATE OF SERVICE**

I hereby certify that on the 4<sup>th</sup> day of April 2025, a true and complete copy of the above and the foregoing *REP SECOND UNOPPOSED MOTION TO EXTEND TIME TO ANSWER THE MOTION TO DISMISS OF DEFENDANTS JOHNSON MATTHEY, INC., CHEVRON USA, INC., CHASE ENVIRONMENTAL GROUP, INC., [Doc. 25] AND THE UNIVERSITY OF TULSA [Doc. 26]* was served using the ECF System for filing and transmittal of a Notice of Electronic Filing to the following ECF registrants:

**Johnson Matthey, Inc.**

**Kaylee Patricia Davis-Maddy**

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s/ Charles C. McCaskey

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*Attorney for Plaintiff*